Lincoln E. Brown
Director-Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 326-8890
Fax 202 408-4806

ORIGINAL

EX PARTE OR LATE FILED

August 11, 1999

EX PARTE PRESENTATION

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

RE: *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98*

Dear Ms. Salas:

On July 30, 1999 Gary Fleming and the undersigned representing SBC met with Jerry Stanshine representing the Office of Engineering and Technology as well as Jon Reel and Vincent Paladini representing the Policy and Program Division of the Common Carrier Bureau to discuss issues in the above referenced docket. This Ex Parte supplements the initial Ex Parte filed on July 30, 1999 memorializing the meeting.

Attached "A" to this letter is a diagram of the various loop configurations deployed by SBC for the provision of Local Exchange Service. The following is a discussion of each configuration and SBC's view as to the feasibility of sub-loop unbundling and collocation in each configuration:

CONFIGURATION 1

This configuration represents approximately twenty six percent of the loops deployed by SBC for the provision of Local Exchange Service. This configuration is one hundred percent copper based and contains no electronics in the loop. The feeder cable is spliced directly to the distribution cable via buried or aerial splices. In some cases(eighty percent), this configuration may contain a Serving Terminal that facilitates cross connections between the distribution cable and the final "drop" to the NID. Where Serving Terminals are not deployed, the distribution plant is spliced directly through to the NID. The size of these Serving Terminals are typically two and one half feet high by eight to ten inches square.

Neither opening splices to provide access to distribution loops by CLEC's, or collocation in Serving Terminals to access drop loops is technically feasible.

CONFIGURATION 2

This configuration represents approximately sixty percent of the loops deployed by SBC for the provision of Local Exchange Service. This configuration is one hundred percent copper based and contains no electronics in the loop. The feeder cable is cross connected to distribution cable by technicians at "Feeder Distribution Interface" (FDI) cabinets, sometimes referred to as SAC (Serving Area Concept) boxes. These cabinets are typically five to six feet high, three to four feet wide, and one to two feet deep. These cabinets are weatherproof and house the individual terminals upon which the feeder and distribution loop pairs are terminated. Once terminated in this fashion, technicians connect distribution loop pairs to feeder loop pairs by placing "jumpers" between the two terminals. These cabinets are generally sized at installation to accommodate the planned number of feeder and distribution cables and do not normally contain unused space to terminate the distribution cable of a CLEC. In cases where unused space is available, it is highly unlikely that more than one CLEC could be accommodated. In the vast majority of cases, in order to accommodate the termination of CLEC distribution cables in existing FDI cabinets, a new cabinet would need to be placed. The cost of placing a new FDI cabinet along with the cost of reconfiguring the existing feeder and distribution cables into the new cabinet will likely render this arrangement cost prohibitive. Indeed, SBC has been ordered by the Kansas and Missouri state commissions to provide CLEC's access at FDI cabinets and has yet to receive a single request from a CLEC for this configuration.

Configuration 3 and 4

These configurations represent approximately fourteen percent of the loops deployed by SBC for the provision of Local Exchange Service. These configuration utilize electronics, generally referred to as digital loop carrier, located at Hubs/Remote Terminals (RT's) or controlled Environmental Vaults (CEV's) that are fed from the central office by either DS-1's over copper pairs or fiber. The electronics at the RT or CEV derives the individual loops from the DS-1's or fiber. In a fashion similar to the copper loop fed FDI arrangement depicted by Configuration 2, the derived loops are cross connected to the distribution loops via a FDI cross connect field located at the RT or CEV.

Remote Terminals are above ground weatherproof cabinets that contain the entrance copper or fiber, electronics, FDI cross connect field, backup batteries, and distribution cable. They are typically five and one half feet high, up to ten feet wide, and three to four feet deep.

Loops derived by the DLC electronics are cross connected to distribution loops in a fashion similar to the copper loop fed FDI cabinet configuration 2. These cabinets are generally sized at installation to accommodate the planned number of feeder and distribution cables and do not normally contain unused space to terminate the distribution cable or electronics of a CLEC. In cases where unused space is available, it is highly unlikely that more than one CLEC could be accommodated. In the vast majority of cases, in order to accommodate the termination of CLEC distribution cables and electronics in existing RT's, a new RT would need to be placed. The cost of placing a new RT along with the cost of reconfiguring the existing distribution cables into the new RT will likely render this arrangement cost prohibitive. Indeed, SBC has been ordered by the Kansas and Missouri state commissions to provide CLEC's access at RT's and has yet to receive a single request from a CLEC for this configuration.

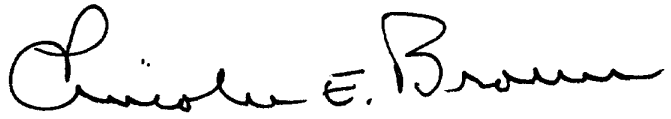
Controlled Environmental Vaults are typically underground structures that contain the entrance copper or fiber, electronics, FDI cross connect field, backup batteries, and distribution cable. They are environmentally controlled and are approximately ten feet wide and twenty five feet long. While these structures provide the best opportunity for collocation of CLEC entrance facilities and electronics, they represent only three tenths of one percent of the loops deployed by SBC for the provision of Local Exchange Service.

Please include this letter and attachments in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,



Enclosures

Cc: Jerry Stanshine
Jon Reel
Vincent Paladini

Loop Architecture
Attachment 1